

FILED

JUL 03 2025

CLERK, U.S. DISTRICT COURT
TEXAS EASTERN

General Complaint

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS

Vijaya Lakshmi Madasu

Case Number : _____

List the full name of each plaintiff in this action.

VS.

Carrick's Auto

List the full name of each defendant in this action.
Do not use "et al".

Attach additional pages if necessary.

I. ATTEMPT TO SECURE COUNSEL:

Please answer the following concerning your attempt to secure counsel.

A. In the preparation of this suit, I have attempted to secure the aid of an attorney as follows: (circle one)

1. Employ Counsel
2. Court - Appointed Counsel
3. Lawyer Referral Service of the State Bar of Texas,
P. O. Box 12487, Austin, Texas 78711.

B. List the name(s) and address(es) of the attorney(s):

Sharon K Campbell (3300 Oak Lawn Ave unit 425, Dallas TX 75219)
Sanjay Minocha (3300 Oak Lawn Ave unit 700, Dallas TX 75219)
Allen Stewart P.C (1700 Pacific Ave suite 2750, Dallas TX 75201)

C. Results of the conference with counsel:

I contacted Sharon K. Campbell & Sanjay Minocha, due to their workload they were unable to represent me at this time, Allen Stewart PC I submitted the documentation they informed me that they were unable to assist due to internal case selection limitation.

II. List previous lawsuits:

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action or any other incidents? ☐ Yes ☒ No

B. If your answer to "A" is "yes", describe the lawsuit in the space below. If there is more than one lawsuit, attach a separate piece of paper describing each.

1. Approximate file date of lawsuit: _____

2. Parties to previous lawsuit(s):

Plaintiff _____

Defendant _____

Attach a separate piece of paper for additional plaintiffs or defendants.

3. Identify the court the lawsuit was filed. If federal, name the district. If state, name the county.

4. Docket number in other court. _____

5. Name of judge to whom the case was assigned.

6. Disposition: Was the case dismissed, appealed or still pending?

7. Approximate date of disposition. _____

III. Parties to this suit:

A. List the full name and address of each plaintiff:

Pla #1 Vijaya Lakshmi Madasu
7220 McCallum Blvd apt 1706 Phas 2, Dallas TX 75252
vijaya0558@gmail.com

Pla #2 _____

B. List the full name of each defendant, their official position, place of employment and full mailing address.

Dft #1: Carrick's Auto
1501 Capital Ave, Plano, TX 75074

Dft #2: _____

Dft #3 _____

Attach a separate sheet for additional parties.

IV: Statement of Claim:

State as briefly as possible the fact of your case. Describe how each defendant is involved. Include the names of other persons involved with dates and places. Do not give any legal arguments or cite cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need, attaching additional pages if necessary.

On April 07, 2025, I purchased a 2017 Lexus IS 200t from Carrick's Auto LLC, Plano TX. The financing of the vehicle was arranged and handled directly by Mr. Joey Tedesco, who was responsible for finance at Carrick's Auto. I paid a \$6000 down payment from my personal savings and Westlake Financial Services financed the remaining balance of the vehicle. This was my first car purchased with all of my savings, ~~as~~

On April 18, 2025, I noticed that the daytime Running light (DRL) was not working. I immediately contacted Carrick's Auto and was told by staff that the mechanic was not available. I continued to follow up over the next few weeks as the car also displayed Maintenance Alert.

Each time, I was told the mechanic was unavailable, and no repair appointment was scheduled.

My first monthly payment of \$522.31 was due on May 20, 2025. Due to personal financial hardship, I contacted westlake financial and asked to delay the payment to June 2, 2025. They agreed but emailed me that a \$30 late fee would be added from the next billing cycle if the payment failed. On June 2, I didn't make the payment because I was on my periods and suffering from severe stomach ache and body pains, I actually forgot to pay at that movement. Later I realized and want to pay with my boyfriend's debit card on July 4th morning, but westlake told me that authorization from the card holder is required, and since my boyfriend (Sharon Prakash Kommalapati) was at some work outside, he could not provide it at that time.

I then requested a payment receipt or barcode so I could pay in person at CVS or Walmart. They told ~~me~~ to provide it but they sent me a link which shows \$0, I contacted again and they told me that the person who's actually dealing with those is not available and once he's available they gonna resend it to me again. And even I told to westlake financial

that I want to make the May and June month Payment together they agreed to make the Payment on June 8, 2025. I contacted them again and again for a Payment receipt. I receive conflicting instructions - one representative told me I owed \$522.31 and another said \$1065. I was willing to pay but the confusion and lack of consistent communication caused distress.

Unbeknownst to me, on June 4, 2025, Carrick's Auto Paid off my auto loan without my authorization. On that day even Mr. Joey Tedesco called me and scheduled a mechanic appointment for June 5 at 11:00 AM, referencing the same repair issues I had previously requested, He did not mention anything about the payoff or the loan being closed.

On June 05, 2025 My boyfriend brought a car to Carrick's auto for the appointment. The staff took the Car Keys and then a Pearson told to my boyfriend that they ~~are~~ had paid off my loan and now owned the vehicle, demanding a Payment of \$17000 if we wanted the car returned. My boyfriend called in shock and I was at a restaurant at that time and became extremely nervous. I took a uber and rushed to the dealership.

At Carrick's Auto, I spoke with Joey Tedesco and asked why i was not informed of the pay off. They claimed the loan had been paid off and that if i wanted my car back, i had to pay them \$17,000. I explained that i had not consented to this and asked for proof. I was shown a document but was not allowed to thoroughly read it and take photograph. when i mentioned to Mr. Joey that i had an email from westlake stating if i missed a payment, i would only be charged \$30 from next billing cycle, he responded by saying that finance companies can lie to customers. I then called westlake a representative told me that a payment had been submitted and was still under processing as of June 5. They also informed me that they were still willing to accept my payment but they could not guarantee whether it would be approved or not. when i informed them that the dealer had already taken my car, he stated that "Sorry mam, we don't know anything about that you need to contact your dealer".

The representative confirmed me that the dealer was the one who contacted westlake to initiate the loan payoff - they were not requested by westlake to do so. Despite the loan still being processed, the dealer took my vehicle and refused to return it.

Joey Tedesco, the same person who handled the vehicle financing, also coordinating the mechanic appointment under false pretense and oversaw the loan payoff. As of now, Casnick's Auto has transferred the title without my authorization and listed my car for sale in their website. They also refused to return down amount.

On the evening of June 30, I again contacted Joey to ask why I was not informed about the loan payoff. He told me that they didn't need my authorization, when I asked him about the title now he's saying he wasn't sure. He ended the call by saying he had another call and never followed up with me.

The entire ordeal has left me mentally and emotionally traumatized. I have suffered sleepless nights, anxiety attacks and overwhelming distress. I am devastated to have lost my car and all of my savings in this way.

I respectfully request the court consider the facts laid out in this claim and assist in recovering my vehicle or appropriate financial compensation and any applicable damages.

I also want to express that I left my car behind that day because I was in complete shock and mentally unprepared to process what just happened.

I had no understanding that such a situation could occur. I was devastated and helpless. Since then, I have not been eating properly and continue to suffer from sleepless nights & emotional breakdowns. The trauma of losing my first car, which I purchased with all of my savings under such unfair and unclear circumstances has deeply affected my mental & emotional well being.

- V. Relief: State Briefly exactly what you want the court to do for you. Make no legal arguments and do not cite cases or statutes. Attach additional pages if necessary.

I respectfully request that the court assist me in recovering vehicle, if the return is not possible, I ask the court to grant me financial compensation at least \$30,000, which is the loss of vehicle and mental distress due to this incident. I also ask the court to consider any further relief that is just fair under the circumstances, including punitive damages if applicable.

Signed this _____ day of _____, 20_____.
(Month) (Year)

I declare (certify, verify or state) under penalty of perjury that the foregoing is true and correct.

Executed on: _____
Date

Vijaya Lakshmi Madasu

Signature of each plaintiff